

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

SHEENAH ARENZ, et al.,

Plaintiffs,

Case No. 19-CV-949

vs.

INMATE SERVICES CORP., et al.,

Defendants.

PLAINTIFF'S SECOND AMENDED COMPLAINT

NOW COMES the above-named plaintiff, Sheenah Arenz (hereafter "Arenz"), by her attorneys, the Law Offices of Robert A. Levine, represented by Robert A. Levine and Jonathan J. Cattey, and for a claim against the defendants, Inmate Service Corporation (hereafter "Company") and Marius Nesby (hereafter "Nesby"), alleges and shows to the Court as follows:

THIRD CLAIM – FAILURE TO SUPERVISE, CONTROL AND TRAIN

19. Reiterates, repeats and realleges by reference all of the allegations set forth in the Complaint and Amended Complaint on file herein, and made a part of this Second Amended Complaint with the same force and effect as if hereinafter set forth in full.

20. The defendant, Company, its agent(s), servant(s) and/or employee(s) as the owners and operators of the Inmate Services Corporation have a duty to protect individuals in its custody, control and care, and to operate their business in a safe manner and to protect the plaintiff Arenz and other individuals in its custody, control and care from any harm that might befall them by reason of the actions and conducts of its agent(s), servant(s) and/or employee(s), such as Nesby.

21. As a proximate result of the negligence of the defendant Company in failing to adequately supervise, control and train its agent(s), servant(s) and/or employee(s), the plaintiff Arenz was seriously injured as hereinbefore set forth while in the Company's custody, control and care.

WHEREFORE, the plaintiff Sheenah Arenz demands judgment against the defendants, Inmate Services Corporation and Marius Nesby on her first, second and third claims, in amounts the trier of fact deems fair and reasonable, together with costs, disbursements and reasonable attorney's fees.

WHEREFORE, the involuntary plaintiffs, State of Wisconsin Department of Health Services and United Healthcare demand judgment against the defendants, Inmate Service Corporation and Marius Nesby, in amounts the trier of fact deems fair and reasonable together with their costs and disbursements.

DEMAND IS HEREBY MADE FOR A TWELVE PERSON JURY

Dated at Milwaukee, Wisconsin, this 26th day of July, 2019.

LAW OFFICES OF ROBERT A. LEVINE

/s/ Robert A. Levine

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on July 26th, 2019, he electronically filed the foregoing Second Amended Complaint with the Clerk of Court using the CM/ECF filing system, which will send notification of such filing to all CM/ECF participants.

LAW OFFICES OF ROBERT A. LEVINE

/s/ Robert A. Levine

Robert A. Levine
State Bar No. 01011965